Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 1 of 16. PageID #: 4575

EXHIBIT A

2019
Neighborhood
District Policing
Committee
Enhancement
Strategy





Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 3 of 16. PageID #: 4577



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

Co	ontents	
1.	Introduction	3
2.	What is CPOP	4
3.	How Do the DPCs fit into the Division's CPOP Plan?	4
4.	Community Relations Board	5
5.	Cleveland Community Police Commission (CPC)	5
6.	Community Engagement Officers (CEO)	6
7.	Facilitating Communication and Cooperation	7
:	a. Identifying Community Resources	7
1	b. Tracking Relationship Building Efforts	8
8.	Recruiting and Expanding DPCs	9
á	a. Survey of Participation	11
1	b. Promoting Monthly Meetings	12
(c. Meeting with Communities	12
9.	Aligning Efforts	13
10.	. Information Sharing	13
11.	. Addressing Crime and Safety	14
12.	. Annual Report	14

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 4 of 16. PageID #: 4578



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

1. Introduction

Law enforcement alone cannot solve public safety problems. Public safety issues revolve around factors that reflect broad, underlying issues that contribute to crime and disorder. Therefore, law enforcement and community members/stakeholders must collaborate and coproduce public safety. The City of Cleveland and the Cleveland Division of Police (CDP) recognize that a significant component of having a successful police department is creating and maintaining relationships with stakeholders in the city. As such, the Mayor, Safety Director, and Chief of Police expect all members of the Division, to create and maintain relationships with community members within their respective commands, and to be responsive to their safety and policing concerns.

To operationalize these community policing expectations, the CDP has created the Community and Problem-Oriented Policing Plan (CPOP Plan). One of the goals of the CPOP Plan is to proactively engage the community and solicit feedback regarding policies and practices. Another is to encourage/promote/stimulate the growth of the District Policing Committees (DPC). These two goals will be addressed simultaneously.

District Policing Committees were formerly called District Community Relations Committees. They are used as a method of establishing and maintaining relationships with community members. There is one DPC per Police District, and each DPC is co-chaired by the District Commander and a civilian resident. The Co-Chairs are assisted by a representative from the Community Relations Board (CRB). DPCs meet monthly and converse and collaborate on public safety issues in their neighborhoods. CDP officers also attend and participate in the meetings.

DPC meetings are open to all members of the community. They provide direct access to the district commander and other members of law enforcement. Residents, the Commanders, and officers communicate about topics such as crime statistics, strategies to address problems, upcoming events and initiatives, CDP policy and practices, and any matter that may arise. The interactions are informative and used to build community/police relationships. DPC meetings also are an opportunity for officers and the Commander to learn more about the community and its members. A significant measurement of success of the Division's efforts at communication and outreach with the community will be the vigor, robustness, and enthusiasm of the DPC's monthly meetings.

This document is a living document and will be updated as necessary. It will address how DPCs will accomplish the following goals:

- Facilitate regular communication and cooperation between CDP and community leaders
- Increase participation in the DPC from a cross-section of community members
- Identify strategies to address crime and safety issues in their district, and the documentation

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 5 of 16. PageID #: 4579



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

 Report identified strategies, concerns, and recommendations to the Cleveland Police Commission (CPC)

2. What is CPOP

Community and problem-oriented policing (CPOP) is a combination of the core principles of community policing and the approach of collaborative problem solving (also referred to as problem-oriented policing). Community policing is a philosophy that promotes organizational strategies that support the proactive, systematic use of community partnerships and problem-solving techniques to address the conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.

Community policing principles refer to the expectation that the Division and its officers will routinely and proactively engage the community to create partnerships and co-produce public safety. It also applies to the aligning of CDP's organizational structure to reflect and support partnerships and community needs/wants throughout the Division. Collaborative problem-solving describes the practice of routine collaboration between police and community members/stakeholders to identify problems, co-produce a solution, and assess the outcome.

CPOP is the responsibility of all members of the Cleveland Division of Police beginning with the Chief and down the chain of command to every officer. The Division and the City of Cleveland are committed to building and maintaining partnerships with all community stakeholders within the city and working with those partners to find sustainable methods to prevent and solve crimes.

In addition to this DPC Strategy Plan, the Division is also developing a CPOP plan. The CPOP plan will address how the Division will operationalize CPOP to transform how service policing services are delivered. It will discuss community policing as it relates to training, recruitment, hiring, leadership, promotions, evaluations, engagement, and problem-solving.

3. How Do the DPCs fit into the Division's CPOP Plan?

DPCs are an essential part of the Division's CPOP plan because they are one of the tools at the Division's disposal for engaging the community and conducting problem-solving. District Commanders will use the DPC meetings as opportunities to identify, assess and collaboratively solve problems in their District. They will also use the sessions to solicit input on the Divisions policies and procedures. The DPCs will assess the Divisions overall performance and its CPOP activities by surveying community members. Officers will use the DPCs as an opportunity to know

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 6 of 16. PageID #: 4580



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

better and understand the members of the community that they patrol and create relationships and partnerships.

DPCs will be a crucial component for CDP Officers to act as "guardian of the community." One of the important aspects of the "guardian" mission is to understand the communities within the city. To fulfill this mission, officers must engage the community outside of a typical law enforcement action and have a basic knowledge of the communities in their assigned area. The DPCs will be one of the many methods that officers will use to engage and learn about the community.

4. Community Relations Board

The Community Relations Board (CRB) contains 14 residents that represent Cleveland's racially, culturally and religiously diverse population. Members include Mayor Frank G. Jackson, Chairman; and Rev. Dr. Charles Lucas, Co-Chair. The Board meets monthly to promote individual's civil rights and to promote peaceful relations among and relieve tension between cultural groups. The Mayor appoints the Board with the approval of City Council. There are also 15 employees assigned to the CRB to perform outreach and administrative tasks.

The CRB concentrate their efforts in the following areas; community/faith-based outreach, multicultural outreach and engagement, conflict mediation, police/community relations, and youth engagement/crisis intervention.

The CRB also helps build police/community relationships through extensive participation in the DPCs. Each DPC contains a CRB representative who works jointly with the District Commanders and the DPC co-chairs to proactively enhance the DPC and build police/community relationships. CRB members attend each meeting, aid in scheduling meeting locations and times, advertise the meetings, events, and initiatives, proactively recruit participants, and maintain a "living" database of participants contact information.

CRB members assist with several initiatives including neighborhood walks with the police, citizens, and council members, community socials where residents have an opportunity to meet the police officers in their district, movie nights, "Coffee with Cops", and sporting events. The CRB also hosts community meetings with block clubs, officers, and residents who share ideas on how to improve the relationship between the community and police and share their experiences.

5. Cleveland Community Police Commission (CPC)

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 7 of 16. PageID #: 4581



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

"The mission of the Community Police Commission is to make recommendations on policies and practices related to community and problem-oriented policing, bias-free policing, and police transparency; to work with the many communities that make up Cleveland for the purpose of developing recommendations for police practices that reflect an understanding of the values and priorities of Cleveland residents; and report to the City and community as a whole and to provide transparency on police department reforms." The CPC holds monthly meetings and several town hall meetings to elicit input from community members on various topics.

At least annually, an officer that participates in each DPC will present identified strategies, concerns, and recommendations to the CPC.

6. Community Engagement Officers (CEO)

All officers are responsible for engaging in community and problem-oriented policing without regard to where they are assigned. It is not the sole responsibility of any single bureau or unit. The officer's assignment will dictate how often they have the opportunity to practice CPOP. Limited opportunities for CPOP do not absolve an officer from exercising community policing principles to the most meaningful extent possible.

The five neighborhood districts contain more than 70% of all CDP personnel. Officers assigned to Districts interact with the community daily. As such, they are primarily responsible for CPOP. There are two sections in each District; patrol and support. The Patrol Section is mainly responsible for all calls for service and community engagement activities. The Support Section provides operational support to the Patrol Section in the form of detective follow-up, vice investigations, traffic enforcement, and localized quality of life enforcement. Officers assigned to the Patrol Section are expected to be the main points of contact for the community and collaborative problem-solving. Under the CPOP Plan, all officers assigned to the patrol section are expected to spend on average, at least 20% of their time devoted to community engagement activities, in addition to their other primary responsibilities of responding to calls for service and basic patrolling.

In addition to the officers assigned to the Patrol Section, each District has three Community Engagement Officers (CEOs) that are expected to spend all of their time devoted to community engagement activities. The CEO program is a grant-funded program whose mission is to aid with entrenching community policing tactics and philosophies throughout the entire Division. The CEOs are picked by the district commander from the officers that patrol the district and are assigned to their commander's office. If the officers do not adequately satisfy the purpose, they will be replaced by officers who are better suited to the task.

¹ Cleveland Community Police Commission, Our Mission, https://www.clecpc.org/mission, July 2018.

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 8 of 16. PageID #: 4582



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

CEOs will not be responsible for responding to calls for service or for patrolling. However, they will do the following:

- Actively participate in their respective DPC
- Seek and maintain community partnerships from a cross-section of the community
- Participate in community engagement activities such as neighborhood walks, foot and bike patrols, and activities that are created by the CDP and community members
- Assist with collaborative problem-solving initiatives
- Attend community meetings
- Visit schools
- Participate in activities at recreation centers
- Collect citizen contact data and assist in analyzing it
- Bridge officers with community members

The CEO grant requires the CDP to ensure that officers are assigned to the program for a minimum of four years. After the grant expires, the Division will determine if the program will continue in its current form, be modified, or terminated. However, the responsibilities of the CEO Officers relative to the DPCs will continue. If the CEO program is terminated or modified, the District Commanders will assign the duties to another officer or officers to ensure that the CEOs' responsibilities to build community partnerships and enhance participation in each DPC will continue uninterrupted.

7. Facilitating Communication and Cooperation

Regular communication and cooperation between CDP and the community is a crucial component of improving police and community relations. Through the monthly meetings and outreach efforts, the DPCs will play an integral part in facilitating the communication. To achieve this goal, the DPCs will identify gaps in communication and participation, and then track and assess their efforts to increase participation from a cross-section of the community.

a. Identifying Community Resources

As discussed in the CPOP Plan, an "Asset Map" is a tool used to "inventory community resources-individual by an individual, association by association, institution by institution, and employer by employer." The City of Cleveland Office of Prevention, Intervention, and Opportunity for Youth and Young Adults maintain the map of community and government resources. Creating the map was a collaboration of many different City entities including the City Planning Commission and Safe Routes. It contains locations of recreation centers, schools, faith-based organizations, and other community resource/organization locations. The map will be distributed to all commanders and available to all officers.

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 9 of 16. PageID #: 4583



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

The map is a starting point and one of many tools that DPCs will use. Each District has a unique mix of neighborhoods with distinct wants/needs, and many may not be exclusive to a pinpoint on a map. The asset maps will help District personnel as they create partnerships and coproduce safety especially as it relates to those that do not readily interact with the Division. It is also important for the DPCs to have this material as they take measures to increase participation. The DPCs are expected to use the map to identify community resources in their areas and as a tool to ascertain gaps in participation. The map is a living document, therefore, as new resources become available, they will be added, and resources that are no longer available will be removed.

Another method to identify local leaders is by participating in community events and interacting with community members and local businesses owners during daily operations. DPCs, CEOs, and CRB will collaborate with businesses, block clubs and neighborhood street organizations to seek out community members who have not been identified. They will invite them to be active participants in the DPCs and encourage them to assist in the following ways:

- Act as mediators
- Share information about upcoming community events
- Help to facilitate interactions between officers and community members
- Help educate the community on CDP processes and policies

Contact information received from community members will be forwarded to the respective DPC co-chair. If a relationship doesn't exist, the DPC co-chairs, CEOs, and/or CRB will meet with them separately. They will encourage the community members to attend and participate in DPC meetings by providing them with the location and times of the monthly meetings, and a synopsis of the purpose of the meetings. They will also discuss methods in which communication and cooperation between the CDP and the community can be enhanced.

b. Tracking Relationship Building Efforts

Once community resources such as citizens, groups/organizations, and stakeholders have been identified, it is vital to maintaining a log of the relationships created. The DPCs will track their relationship building efforts by creating and maintaining a spreadsheet. The spreadsheet will include:

- The names of the community members contacted
- The date contacted
- The organization/group that they represent

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 10 of 16. PageID #: 4584



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

- The point of contact for the organization
- Their address
- Telephone number
- Email address
- How many meetings DPC members attended with the group/organization
- How many DPC meetings the group/organization attended
- Identified barriers or challenges

By monitoring their efforts, the DPCs will have a more comprehensive idea of any challenges or barriers faced while building communication and cooperation. Having the information will allow the DPC to identify trends associated with obstacles and challenges to enhancing communication, giving them the opportunity to make adaptations.

Each DPC will determine the point officer for storing information collected from the DPC meetings. They will be designated as the District Policing Committee Information Coordinator (DPCIC) and will be selected from the three Community Engagement Officers at each DPC. All information will be stored electronically and shared with all district commanders and DPCs, the commander of the Bureau of Community Policing (BCP), the CRB, and the CPC.

8. Recruiting and Expanding DPCs

Attendance at a DPC meeting should resemble the demographic makeup of the District. Involvement in DPCs by a representative cross-section of the community will enhance trust in the CDP and will allow District Commanders to better identify and address public safety problems in their districts. District Commanders will include, as a core component of their monthly DPC meetings, a discussion to address strategies to increase participation from a cross-section of their respective District. The DPC will track the strategies used and its effectiveness. Some of the strategies include:

- Utilizing each District's Asset Map to identify groups/associations/community "assets" that currently are not involved with the DPCs
- Intentional outreach to communities such as youth, homeless, and LGBTQ
- Participating in events hosted by communities
- Partnering with organizations such as the Community Development Corporations (CDC) and block and street clubs
- Moving meetings to different locations and times
- Creating "Zone Captains." The initiative will include citizen volunteers who live in each of the patrol zones within a District being elected a "Zone Captain." The zone captains are

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 11 of 16. PageID #: 4585



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

expected to participate in community events and work to plan other activities to support the police and citizens in the district (i.e., develop block clubs, community safety forums with citizens and police, and community socials to meet police working in the District). They will also work to increase participation from a cross-section of the community. They are elected by the DPC participants.

• Increasing advertising efforts

DPCs must also account for community members that may be unable or unwilling to participate in monthly meetings. Increasing participation from community members that are unable to attend can be challenging. Moving the meeting location and/or time can be accommodating to some, and can increase participation for some, but can be to the detriment of others. Increasing participation from community members that are unwilling to participate is also very challenging. Community members that do not attend due to a lack of trust or fear of being perceived as too closely aligned with law enforcement require time, tactfulness, and understanding. DPCs will, on a regular basis, attempt to increase participation from community members that are unable or unwilling to participate, including by:

- Providing the dates and locations of the meetings and encourage participation
- Providing community members with more information about the goals and objectives of the meetings
- Add new discussion items to the agenda that are requested by community members
- Moving the meeting time and/or location to increase accessibility and focus on different areas' concerns
- Asking community members about other reasons for the lack of participation, and modifying monthly meetings where possible to address those concerns
- Participating in events that the community members create or are a part of
- Having regular interactions that are not topic specific to build trust
- Meeting with the community members/organizations separately, and at a location that they
 are comfortable.

If community members are still unwilling or unable to attend the meetings, the DPC co-chairs, CEOs and CRB will continue to meet with them at least quarterly, and discuss the topics of the monthly DPC meeting and any other concerns that they may have.

The co-chairs, CEOs, and CRB will track the concerns and strategies discussed with the community members and provide that information to the participants at the DPC meeting.

While meeting with community members separate from the monthly or even a quarterly DPC meeting does not replace participation in the regular committees, sharing the information garnered from all the meetings with all parties creates an informational loop that promotes the mission of the

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 12 of 16. PageID #: 4586



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

DPCs. The DPCs will benefit from this participation from a cross-section of the community when the smaller meetings with community members result in the same information, recommendations, and strategies being more widely shared and disseminated.

a. Survey of Participation

To expand participation in the DPC to include a cross-section of community members, DPCs must first identify the community members that do not attend the meetings. The co-chairs will query the participants who participate in the meetings to determine the organization/group and or the demographic that they represent. They will use a survey to assess the participants at three (3) consecutive DPC meetings. Participants will only complete the survey once. The co-chairs will use the data collected from the survey to identify gaps in participation. Once the gaps have been identified, the co-chairs will use the strategies listed above to reach out to underrepresented groups/organizations and encourage participation. The survey will ask the following questions:

- Are you a resident of this District?
- How did you learn about the DPC meeting?
- What motivated you to attend the meeting?
- Are you participating in the DPC meeting as a representative of a group/organization?
- If you are participating in the DPC meeting as a representative of a group/organization, select one of the following:
 - o Community.
 - o Faith-based.
 - o Local/County/State/Federal government.
 - o Health services.
 - o Law Enforcement.
 - o Local business community.
 - o Social services.
 - o Youth.
 - o Other.
 - o If you selected other, please indicate the group/organization that you represent here.
- Are there any stakeholder groups in the community you consider underrepresented at this meeting?
- Why do you believe these groups do not attend the meetings?
- How do you suggest we engage this/these group(s)?
- Would you be willing to help facilitate a connection with this/these group(s)?

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 13 of 16. PageID #: 4587



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

b. Promoting Monthly Meetings

The CDP and DPCs will increase the promotion of the DPC meeting dates and location. Every District Commander will include DPC meeting dates and locations on their respective Facebook pages. Additionally, the CRB will post the meeting dates and locations on the Community Relations Board website.

Along with social media, the DPC's will create flyers detailing the meetings, and utilize the CEOs and CRB members to distribute them in places such as

- Places of worship
- Recreation centers
- Businesses, such as stores, barber shops, and beauty salons
- Community development centers
- Parks
- Pools
- City-owned facilities that have public access
- Public housing properties and residential facilities

The flyers will be distributed at least quarterly, and the locations circulated cataloged. At least one week prior to each DPC meeting, the flyers will be replenished where needed. Copies of the fliers will also be made available to CDP officers for distribution to community members. The District Commanders will also ensure that the Community Liaison to the Chief is made aware of all DPC meetings by providing the dates and locations of all the meetings.

CRB members maintain a database that contains DPC participant contact information. They use the database to send out various items of interest including upcoming DPC meetings and community events. CRB members will partner with organizations such as the Cuyahoga Metropolitan Housing Authority (CMHA) to increase their information distribution database.

District Commanders will ensure that all of the officers that are assigned to their district are aware that a goal of the DPCs is to facilitate conversations between CDP and a representative cross-section of the District community. Furthermore, the commanders will also ensure that their officers understand that they are expected to promote participation and that encouraging participation in the DPCs is a community engagement activity.

c. Meeting with Communities

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 14 of 16. PageID #: 4588



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

Ultimately, DPCs strive to have a representative cross-section of their District community members participate in the meetings so that the demographics of the participants align with that of the district itself.

However, as stated above, some community members may be unable or unwilling to attend and participate in the DPC meetings. Nevertheless, it is important that the relationships are maintained, and the information is shared.

Therefore, District Commanders, CEOs, and CRB members will meet with the community members separately to discuss their safety concerns and to discuss strategies and recommendations to address them. District Commanders, CEOs, and CRB members will also meet with community members separately to listen to any concerns that they may have. Along with discussing safety concerns, they will also discuss the specific reasons for the lack of community member participation and strategies that the DPCs can use to increase participation from them and others. District Commanders, CEOs, and CRB will also meet with the faith-based community, social services, local business owners and other community leaders in their respective districts, to encourage participation in the DPC.

9. Aligning Efforts

While each District contains diverse community members and groups/organizations with many unique needs, there is value in the DPCs sharing information. Many of the challenges are similar, and therefore, some strategies can be uniform. It is equally vital that the DPCs have autonomy in producing some of the strategies for their unique mix of community members.

Therefore, at least bi-annually, district commanders, CEOs, CRB district representatives, DPC cochairs, and the BCP Commander will meet to discuss current efforts and strategies to increase participation at each DPC and their effectiveness. Each district will also address community engagement and problem-oriented policing successes and challenges. The goal of the meeting is to share strategies and align efforts as needed. The Bureau of Community Policing Commander will convene and direct the sessions.

10. Information Sharing

In addition to sharing information about strategies and challenges of increasing participation, information collected from DPC meetings can potentially be important to other commands. Usually, this type of information is more urgent than determining the effectiveness of strategies and is typically shared immediately with the affected command.

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 15 of 16. PageID #: 4589



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

Bi-weekly, all members of the CDP Command Staff meet to discuss concerns, expectations, initiatives, and other administrative information or updates. During the meeting, every member of the Command Staff is allotted the opportunity to share information about their command. During this meeting, relevant information gained from DPC meetings/initiatives will be shared and discussed with the entire Command Staff, and provided to officers as appropriate.

11. Addressing Crime and Safety

DPCs work with District Commanders to identify specific strategies to address crime and safety in their district. Additionally, DPCs will track and record the identified strategies, concerns and suggestions. To memorialize the strategies, concerns, and recommendations for the annual report to the CPC, DPCICs will create and maintain a spreadsheet. The spreadsheet will be updated at least quarterly, and include strategies used to address:

- Crime and safety
- Enforcement priorities
- Community policing strategies
- Concerns and recommendations about CDP policing tactics and initiatives in their districts, and other community complaints
- Dates that the strategies were implemented and their effectiveness

When a DPC identifies a specific public safety problem to address, a "Work Plan" will be created. Working with the CRB representative, CEOs will create the work plan. The plan will include the steps used to identify and address the problems using the Scanning, Analysis, Response, and Assessment or SARA model where appropriate. The "scanning" step refers to several methods to identify problems and potential consequences of the problem. "Analysis" refers to identifying the conditions of the problems, understanding and researches the known elements of the problem, and identifying relevant data and available resources. The "response" portion of SARA refers to the steps taken to solve the problem, and "assessment" refers to the evaluation of the strategy used. The CEO will also make a Computer Aided Dispatch (CAD) entry and complete the "work plan" in the designated software. The Division is researching the usage of one of its software systems to track problem-oriented policing efforts. To date, the software and process are still being determined.

12. Annual Report

Annually, each DPC will prepare a written report depicting identified strategies, concerns and recommendations to address crime, safety, and increased participation in the DPC. Additionally, each DPC will include an assessment of ways that they will address, and barriers to, implementing

Case: 1:15-cv-01046-SO Doc #: 235-1 Filed: 02/14/19 16 of 16. PageID #: 4590



Neighborhood District Policing Committee Enhancement Strategy

Chief Calvin D. Williams

the identified strategies, concerns and recommendations. Upon completion, the report is presented to the CPC. The first report will be submitted by the end of the first quarter of 2019, and by the third Monday in September of the following years.